

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04 CV 11948 RGS

SEYED MOHSEN HOSSEINI-  
SEDEHY,  
Plaintiff

v.

ERIN WITHINGTON  
Defendant

**DEFENDANT ERIN WITHINGTON'S PROPOSED VERDICT ON SPECIAL  
QUESTIONS TO THE JURY**

1. Do you find that the Plaintiff, Seyed Mohsen Hosseini-Sedehy, has proven by a preponderance of the evidence that the Defendant, Detective Erin Withington, violated his rights under the United States Constitution by arresting him without probable cause (probable cause meaning that the facts and circumstances within the officer(s) knowledge at the time and of which she had trustworthy information were sufficient to warrant a prudent person to believe that the Plaintiff had committed an offense)?

NO \_\_\_\_\_ YES \_\_\_\_\_

If you answered "yes" proceed to question 2. If you answered "no" proceed to question 2.

2. If you answered YES to question 1:

Do you find that the Plaintiff, Seyed Mohsen Hosseini-Sedehy, has established by a preponderance of evidence that the Defendant, Detective Erin Withington's action(s) proximately caused the Plaintiff to suffer any injury?

NO \_\_\_\_\_ YES \_\_\_\_\_

*Proceed.*

3. What amount of damages, if any, do you award to the plaintiff against Detective Withington (Answer in dollars or NONE):

\$ \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
FOREPERSON

Respectfully submitted,  
DEFENDANT ERIN WITHINGTON  
By her attorneys:

/s/ Helen G. Litsas  
MaryBeth C. Long, BBO #652840  
Helen G. Litsas, BBO# 644848  
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**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electric Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 6, 2007.

/s/ Helen G. Litsas  
Helen G. Litsas